

Sept 1, 1986

STATE OF MICHIGAN



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DEPARTMENT OF NATURAL RESOURCES

XXXXXXXXXXXXXXXXXXXX

Gordon E. Guyer, Director  
S.E. Michigan Field Office  
15500 Sheldon Road  
Northville, MI 48167

August 4, 1986

J.E. Berger Corporation  
5300 Bellevue Ave.  
Detroit, MI 48211  
ATTN: Dave Canosa

RE: Hazardous Waste Inspection

Dear Mr. Canosa,

On July 25, 1986, acting as a representative of the United States Environmental Protection Agency, I performed an inspection of your facility located at 5300 Bellevue Ave., Detroit, MI. The purpose of this inspection was to evaluate compliance of that facility with the requirements of Subtitle "C" of the Resource Conservation and Recovery Act (RCRA) as amended.

As a result of that inspection, it has been determined that the above facility is in violation of some of the requirements of subtitle (c) of RCRA. Specifically, the following was found:

1. Approximately 40 drums of transformer oil and mineral spirit were stored on-site. Hazardous waste containers were not marked with the words "Hazardous Waste" nor marked with the accumulation start date as required in 40 CFR 262.34.

As a generator of hazardous waste, you are required to determine its hazardous characteristics as outlined in 40 CFR Part 262.11. Also, you must ship the waste off-site to a license hazardous waste treatment, storage or disposal facility. A hazardous waste manifest form must accompany the waste shipment and an EPA identification number must be obtained before you offer your hazardous waste for transportation to an off-site disposal facility.

As discussed during the inspection, you will submit to this office, waste analysis results and manifest documents. Also, you have indicated the company generate very small quantities of hazardous waste (0-100 kilograms a month). Small quantity generators requirements are outlined in 40 CFR 261.5.

US EPA RECORDS CENTER REGION 5



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J.E. Berger Corp.  
Detroit, MI  
RE: Hazardous Waste Inspection

Please note that anytime in the future, if you should generate hazardous waste in large quantity, you will need to comply with the generator standards outlined in 40 CFR Part 262.

Please respond and provide documentation on any actions you have taken to correct these violations by September 1, 1986. If you have any questions regarding this matter, please feel free to contact me at 313-459-9180.

Sincerely,



Faye Dade

Hazardous Waste Division

FD/bs

cc: U.S. EPA, Region V  
B. Okwumabua  
L. Morgan, LED